

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DINA CAPITANI,)	
)	
Plaintiff,)	
)	
v.)	Case No. 3:19-cv-00120
)	
WORLD OF MINIATURE BEARS, INC.,)	
et al.)	
)	
Defendants.)	Judge Crenshaw
)	Magistrate Judge Frensley

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A
RESPONSE TO DEFENDANT MINIBEARS GEMS AND GIFTS, INC.'S MOTION TO
ALTER OR AMEND CERTAIN FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Plaintiff Dina Capitani (“Plaintiff”) respectfully moves the Court to extend the deadlines associated with Defendant MiniBears Gems and Gifts, Inc.'s Motion to Alter and Amend Certain Findings of Fact and Conclusions of Law (Docket No. 126) as follows. As grounds for this Motion, Plaintiff states the following

1. MiniBears Gems and Gifts, Inc. filed its Motion to Alter or Amend Certain Findings of Fact and Conclusions of Law on August 30, 2021 (Docket No. 126).
2. On September 2, 2021, the Court entered an Order (Docket No. 133) requiring Plaintiff to file a response by September 9, 2021, and Defendant MiniBears Gems and Gifts, Inc. to file any reply by September 16, 2021.
3. Plaintiff's counsel will be out of the country on vacation September 4 through September 11, 2021. Therefore, Plaintiff respectfully requests that the Court extend Plaintiff's response deadline to September 14, 2021, and Defendant's reply deadline to September 21, 2021.

3. Plaintiff's counsel has conferred with defense counsel and Defendant does not oppose this motion.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order extending the deadline from September 9, 2021 to September 14, 2021 for Plaintiff to file a response to Defendant MiniBears Gems and Gifts, Inc.'s Motion to Alter and Amend Certain Findings of Fact and Conclusions of Law, and to extend the deadline from September 16, 2021 to September 21, 2021 for Defendant to file any reply.

Respectfully submitted by:

DICKINSON WRIGHT PLLC

/s/ Autumn L. Gentry
Autumn L. Gentry, #20766
Joshua L. Burgener #29077
424 Church Street, Suite 800
Nashville, Tennessee 37219
Phone: (615) 244-6538
Fax: (844) 670-6009
agentry@dickinsonwright.com
jburgener@dickinsonwright.com

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2021, a true and exact copy of the foregoing has been served on the following via the Court's electronic filing system:

John A. Beam, III
Desireé J.C. Goff
Equitus Law Alliance PLLC
709 Taylor Street
P.O. Box 280240
Nashville, TN 37228
beam@equituslaw.com
goff@equituslaw.com

/s/ Autumn L. Gentry
Autumn L. Gentry

4829-6728-2681 v1 [99997-70408]